

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Kane, et al.

Plaintiffs,

vs.

de Blasio, et al.

Defendants.

SUPPLEMENTAL DECLARATION OF
SUJATA S. GIBSON

Civil Action No. 1:21-cv-07863

STATE OF NEW YORK)
) ss.:
COUNTY OF TOMPKINS)

SUJATA GIBSON, an attorney admitted *pro hac vice* to practice before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am the attorney for the Plaintiffs and am fully familiar with the facts and circumstances of this case.
2. I make this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. Attached hereto as **Exhibit 1** is, upon information and belief, a true and accurate copy of the last enacted collective bargaining agreement of the United Federation of Teachers with NYC DOE containing material terms regarding arbitration.
4. Attached hereto as **Exhibit 2** is, upon information and belief, a true and accurate copy of the last collective bargaining agreement of the Council of Supervisors and Administrators with NYC DOE containing material terms regarding arbitration.

5. Attached hereto as **Exhibit 3** is a true and accurate copy of the PIX11 News publication on October 6, 2021, by James Ford entitled *NYC DOE employees reassigned over vaccine mandates say students, schools are shortchanged*.
6. Attached hereto as **Exhibit 4** is a true and accurate copy of a tweet by New York City Council Member Mark Treyger posted on October 4, 2021 at 10:29 a.m.
7. Attached hereto as **Exhibit 5** is a true and accurate copy of a transcript of the August 5, 2021 interview between Dr. Walensky of the CDC and Wolf Blitzer.

Dated: October 7, 2021

Respectfully Submitted,

Sujata S. Gibson

Sujata Gibson